Date: January 10, 2022

Re: Ideavillage Products Corp. v. 001xiaopuzi, et al. Civil Case No. 19-cv-9160

Proposed Discovery Schedule

Dear Judge Preska,

I Defendant Venus Rainbows in the above-referenced action. In accordance with the directives of the Court's December 21, 2021 Order (Dkt. 62), together with Plaintiff's Counsel, the parties have agreed on a proposed discovery schedule.

The parties have agreed to complete discovery as follows:

- * The parties' deadline to serve written discovery demands is February 21, 2022;
- * The parties are to respond to the written discovery demands by March 21, 2022;
- * Depositions are to be completed by April 25, 2022; and
- * Expert discovery (if any) is to be completed by May 25, 2022.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Quan Liu, Pro se Defendant

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